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Attorneys for the Petitioner

IN THE MATTER OF	:	POSTAL REGULATORY COMMISSION
THE PROPOSED CLOSING OF	:	
THE FREEHOLD BOROUGH	:	PETITION TO APPEAL POSTAL SERVICE
POST OFFICE	:	DETERMINATION TO CLOSE POST OFFICE

The Mayor and Council of the Borough of Freehold respectfully petition the Postal Regulatory Commission as follows:

1. The Petitioner, Borough of Freehold is a body politic.
2. The Respondent is the United States Postal Service.
3. A copy of the correspondence from the USPS advising of the final decision to close the Freehold Borough post office and the Notice to Patrons are attached.
4. The Mayor and Council of the Borough of Freehold have been duly elected to represent the citizens of Freehold Borough. The Mayor and all Council members reside in the Borough of Freehold.
5. Freehold Borough is the County Seat of Monmouth County, New Jersey, home to the Monmouth County Court House, Monmouth County Clerk's office, the Board of Chosen Freeholders, and numerous County offices.
6. As the County Seat, Freehold Borough is the hub of commerce and government services. The lack of a postal facility would result in a major disservice and tremendous inconvenience to these users, which include the County Government and Monmouth Vicinage of the New Jersey Superior Court.
7. The closing of the Freehold Borough post office would leave Freehold as the only County Seat in the State of New Jersey without a postal facility.
8. Freehold Borough is home to a large immigrant pedestrian population who would have no means of access to a postal facility in the event the Freehold Borough post office is closed. The large amount of pedestrian users would not be able access the Freehold Township postal facility without great difficulty and expense.

9. Though only 2.5 from the Freehold Borough facility, the Freehold Township postal facility is not easily accessible. The traffic between the two locations is extremely heavy and the 2.5 mile trip can easily take over 15 minutes. Two state highways intersect Route 537 between the two post office locations.
10. A large part of the extremely busy Route 537 does not have sidewalks, leaving the pedestrians who venture to the Township facility at risk of harm.
11. The large immigrant population does not have access to computers and therefore cannot utilize the Postal Services website to purchase stamps, shipping labels or to request package pickup.
12. The Township facility has inadequate parking, inadequate and unsafe vehicular circulation and excessive waiting times.

Petitioner herein requests that the determination to close the Freehold Borough Post Office be overturned.

Freehold Borough

By: Kerry E. Higgins
Freehold Borough Attorney